

To Whom It May Concern

It's been brought to my attention that you are seeking comments on the elimination of Morse Code as a requirement for HF radio operations in the United States. In my opinion with the technologies available today, Morse Code has become an outdated mode of communication. Times and technology have changed dramatically over the years, and the previous reasons for requiring Morse Code proficiency of all amateur radio operators were dropped by the ITU during "WRC-03". Many of the government or commercial radio services no longer use Morse Code in today's world. The historical need of the government, commercial, and maritime services for a "pool of (Morse Code) trained operators" has ceased to exist. The need for the Morse Code skills is no longer required for effective emergency communications by amateur operators.

The requirement of Morse Code proficiency for any amateur radio license is no longer in accord with the purpose of the amateur radio service and serves no legitimate regulatory purpose. The Morse Code requirement seems to be contrary to one of the commission's statutory mandates. The IARU recognized that continuing Morse Code requirements for HF operation is not in the best interest of the future of the amateur radio service. Since the United State's administration is no longer bound by a requirement in the ITU Radio Regulations it can, and should, act promptly to remove an unnecessary, restrictive requirement. Other administrations around the World has already eliminated the Morse Code requirement for HF operation. I feel it will not be long before other administrations around the World will follow in their footsteps eliminating the Morse Code testing for HF operation. I would like to see the administration of the United States to act on this issue as well.

It has been the Commission's own determination, as well as comments from the public, during the proceedings in both 1990 and 1999, as referenced in the NCI

Petition, it's clear that a Morse Code proficiency test requirement is unnecessary and undesirable, in that:

It does not comport with the basis and purpose of the Amateur Radio Service.

It acts as a barrier to entry or advancement to otherwise qualified persons.

It is not necessarily indicative of an individual's ability to contribute to the advancement of the radio art.

It does not provide any indication of the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules.

It no longer continues to serve a regulatory purpose.

It otherwise does not serve the public interest and necessity.

The administration of the United States has the authority to amend Part 97 rules, to eliminate Morse Code proficiency requirements by expedited order, without formal notice and public input. By granting NCI's Petition, a burden on applicants for amateur radio licenses would be removed, no additional requirement would be imposed, and therefore no party or other person would be prejudiced by the administration's Part 97.

The administration of the United States should refrain from combining NCI's request for the prompt elimination of the Morse Code test requirement from its rules. This should not include any issues with other substantially unrelated issues such as, but not limited to, band segmentation, changes in the number of license classes, sweeping changes in operator privileges by license class, etc., because that would result in a delay in resolving this important and clear-cut issue.

In summary, for all of the reasons outlined and referenced herein, the administration of the United States should enact the following changes to its rules in the most expeditious manner possible:

Eliminate the "Element 1" Morse Code test totally from the administration of the United States rules for all license classes. Since the only testing distinction between the Technician class and the (grandfathered) Technician Plus class is the "Element 1" Morse Code Test, modify, as a consequential and logical change, the privileges afforded to Technician class licensees to be equivalent to those currently afforded to Technician Plus licensees and "Technician with Morse credit" licensees

Respectfully submitted,
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